



State of California – A Natural Resources Agency
OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 15th Floor | Sacramento, CA 95814
916.902.6000 | www.energysafety.ca.gov

Gavin Newsom, Governor
Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

DATA REQUEST

Request Date: Tuesday, December 30, 2025

Response Due: Monday, January 5, 2026

To: Pooja Kishore, Regulatory Affairs Manager
Pooja.Kishore@pacificorp.com
PacifiCorp dba Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Cc: datareq@pacificorp.com
Melissa Swenson, PacifiCorp
Lakshmi Nair, PacifiCorp

Originator: Jolynne Flores, Wildfire Safety Analyst
Jolynne.Flores@energysafety.ca.gov

Data Request Number: OEIS-P-WMP_2025-PC-17

Subject(s):

- Q01. Regarding Record Keeping Procedure for Key Risk Assessment Improvement Plans
- Q02. Regarding Incomplete Asset Records Found
- Q03. Regarding Grid Design, Operations, and Maintenance Expenditures

INSTRUCTIONS

1. Provide all information in your possession, custody, or control, or the possession, custody, and/or control of your affiliates or agents, that is responsive to these data requests by the due date identified above.
2. Responses and documents may be produced and served electronically, but they must be fully machine-readable and searchable.
3. If you have any questions about the meaning or scope of the data requests herein, direct such questions to the Energy Safety staff identified as the “Originator” of this request at your earliest opportunity.
 - a. Lack of clarity on meaning or scope of requests without prior request for clarification to the “Originator” will not be a permissible reason for incomplete responses and will be regarded as non-compliance with the request.
4. Identify the personnel (e.g., employees, consultants, agents, etc.) who provided information responsive to each of the data requests below. As used in this context herein, “identify” means to provide the full name, email, business address, and title of each employee, consultant, or agent who provided such information.
5. If you do not know the exact answer to any of the requests below, please so indicate and provide your best estimate.
6. Provide data in its original format (e.g., Excel, GIS shapefile, etc.), unless otherwise specified in the request.
7. Submit your response to the 2026-2028 WMP Data Requests docket (#2026-2028-Base-WMP-DRs) by close of business on the response due date.
 - a. Submit confidential information through the confidential e-filing process. Do not submit confidential responses through email.
 - b. If you try to submit a file that is not permissible in the docket, please reach out to your Energy Safety “Originator”.
8. Email the non-confidential portion of the response to Jolynne Flores, Wildfire Safety Analyst Jolynne.Flores@energysafety.ca.gov, copying:
 - a. Dakota Smith (Dakota.Smith@energysafety.ca.gov)
 - b. Steve Kerr (Steve.Kerr@energysafety.ca.gov)
 - c. Johan Im (Johan.Im@energysafety.ca.gov)
 - d. Andie Biggs (Andie.Biggs@energysafety.ca.gov)
 - e. Paul Ramstad (Paul.Ramstad@energysafety.ca.gov)

REQUEST

Q01. Regarding Record Keeping Procedure for Key Risk Assessment Improvement Plans:

On page 457 of its 2026-2028 Base WMP R1 - Clean, PacifiCorp states, “Currently PacifiCorp does not have an enterprise system to track its risk assessment initiatives.”

- a. Describe how PacifiCorp will track and monitor the Key Risk Assessment Areas listed in Table 5-6: Utility Risk Assessment Improvement Plan.

Q02. Regarding Incomplete Asset Records Found:

On page 457 of its 2026-2028 Base WMP R1, PacifiCorp stated that “When asset records are found to be incorrect or incomplete, or require updates, periodic cyclical inspections identify these deficiencies, prompting updates to the relevant databases.”

- a. Describe the ways in which are “found” to be incorrect or incomplete.
- b. Describe PacifiCorp’s “periodic cyclical inspections” which identify these deficiencies.
- c. Describe the way(s) “updates to the relevant databases” are conducted.

Q03. Regarding Grid Design, Operations, and Maintenance Expenditures:

In its 2026-2028 Base WMP R0 data submission,¹ PacifiCorp submitted Grid Design, Operations, and Maintenance expenditures of \$485.7 million that adds to the following breakdown:

- \$469.1 million in the HFTD (97 percent) and
- \$16.6 million in the Non-HFTD (3 percent).

In its Base WMP R1 submission,² provided in conjunction with PacifiCorp’s Revision Notice response, Grid expenditures are \$483.8 million that adds to the following breakdown:

- \$295.8 million in the HFTD (61 percent) and
- \$188 million in the Non-HFTD (39 percent).

In PacifiCorp’s response to Data Request 11, Question 1.b, which inquired about PacifiCorp’s WMP R0 data submission and asked why PacifiCorp was able to provide a projected expenditures for Grid Design, Operations, and Maintenance, PacifiCorp stated, “PacifiCorp

¹ [PC 2026-WMP R0](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59034&shareable=true), Published Jul. 23, 2025,

URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59034&shareable=true>)

² [PC 2026-WMP R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59860&shareable=true), Published Dec. 10, 2025,

URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59860&shareable=true>)

provided a breakout of projected expenditure for initiative GH-01: Grid Hardening and System Design because the planned work is within the HFTD.”³

In PacifiCorp’s WMP R1 data submission, a few of its grid design, operations, and maintenance expenditures entries provide a comment stating that “Forecasted expenditures consistent with % Planned in HFTD per year in Table 8-1 of the 2026-2028 Base WMP.”

- a. Explain the reason(s) why PacifiCorp’s projected WMP expenditures for Grid in the HFTD decreased to \$295.8 million (WMP R1) from \$469.1 million (WMP R0).
- b. Explain the reason(s) why PacifiCorp’s projected WMP expenditures for Grid in the Non-HFTD increased to \$188 million (WMP R1) from \$16.6 million (WMP R0).
- c. Explain why PacifiCorp’s projected expenditures for Grid decreased from 97 percent in the HFTD to 61 percent.

END OF REQUEST

³ PacifiCorp response to [Data Request 11](#), Question 1.b, Published Oct. 3, 2025,
URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59468&shareable=true>)